



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION - VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI 64106

[Handwritten signature: Debbie]

Site:	<i>[Handwritten: 11-11-82]</i>
ID#:	<i>[Handwritten: 11-11-82]</i>
Break:	<i>[Handwritten: 11-11-82]</i>
Other:	<i>[Handwritten: N/D]</i>

Mr. David Edwards
Facilities Manager
Litton Advanced Circuitry
P.O. Box 2847, Commercial Station
Springfield, Missouri 65803

Dear Mr. Edwards:

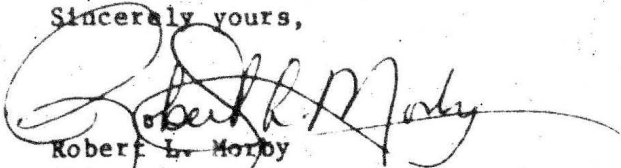
We have reviewed the revised closure plan dated July 16, 1982. The following comments should be addressed in an amendment to the July 16 closure plan:

1. Please include the name of the hazardous waste landfill in the amendment.
2. EPA will issue a public notice announcing that closure is underway due to the Missouri Department of Natural Resources Notice of Order and allowing for public review of the closure plan.
3. The revised closure plan does not include a closure cost estimate. The closure cost estimate should include all costs for closing the surface impoundment, such as contractor costs and certification costs.
4. The closure plan should include more detailed information on the depth of soil samples.
5. It is difficult to determine from the closure plan at what point(s) in the cleanup operation soil samples will be taken. Soil samples should be taken at various depths after the sludge is removed to determine the depth(s) of excavation. Soil samples should also be taken after the excavation is complete, but prior to placement of the cap, to verify that the levels of soil contaminants are below the established levels.
6. The closure plan proposed that the level of lead and chromium contamination in the soil be less than 2.5 ppm. Is this an EP toxicity level or total level of contamination?
7. From our review of the EP toxicity data we cannot determine if the lead and chromium content of the sludge samples passed or failed the EP toxicity test. The two sets of data from the Bruce Williams Laboratories apparently do not correspond. We cannot concur that the 2.5 ppm level is sufficient until we receive EP toxicity data which clearly indicates whether the sludge passed or failed the EP toxicity test.
8. Are there any plans for vegetation on top of the cap?
9. Why were sample points omitted along the line 300 feet north and 300 feet east of the inlet?

10. The closure activities as proposed will not require a revised Part A application unless treatment or storage of the sludge or supernatant occurs on-site.

If you have any questions, please contact Karen A. Flournoy at (816) 374-6531.

Sincerely yours,



Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

cc: Paul Meiburger, MDNR